

JAN 06 2021

JAMES N. HATTEN, Clerk
By:  Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

TERRELL DAVIS A/K/A
"RALO"

Criminal Information

No. 1:20-CR-509-MLB

THE UNITED STATES ATTORNEY CHARGES THAT:

Count One

Beginning on a date unknown to the United States Attorney, but at least by in or about December 2017, and continuing until on or about December 22, 2017, in the Northern District of Georgia and elsewhere, the defendant, TERRELL DAVIS, also known as "Ralo," and others known and unknown to the United States Attorney, did knowingly and willfully combine, conspire, confederate, agree and have a tacit understanding with one another, to violate Title 21, United States Code, Section 841(a)(1), that is, to possess with the intent to distribute a controlled substance, said conspiracy involving at least 100 kilograms of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(vii), all in violation of Title 21, United States Code, Section 846.

Count Two

On or about December 22, 2017, in the Northern District of Georgia and elsewhere, the defendant, TERRELL DAVIS, also known as "Ralo," and others known and unknown to the United States Attorney, aided and abetted by one

another, did knowingly and intentionally possess with the intent to distribute a controlled substance, that is, at least 100 kilograms of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(vii), all in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Count Three

Beginning on a date unknown to the United States Attorney, but at least by in or about April 2018, and continuing until on or about April 15, 2018, in the Northern District of Georgia and elsewhere, the defendant, TERRELL DAVIS, also known as "Ralo," and others known and unknown to the United States Attorney, did knowingly and willfully combine, conspire, confederate, agree and have a tacit understanding with one another, to violate Title 21, United States Code, Section 841(a)(1), that is, to possess with the intent to distribute a controlled substance, said conspiracy involving at least 100 kilograms of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(vii), all in violation of Title 21, United States Code, Section 846.

Count Four

On or about April 15, 2018, in the Northern District of Georgia and elsewhere, the defendant, TERRELL DAVIS, also known as "Ralo," and others known and unknown to the United States Attorney, aided and abetted by one another, did knowingly and intentionally possess with the intent to distribute a controlled

substance, that is, at least 100 kilograms of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(vii), all in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Count Five

On or about April 18, 2018, in the Northern District of Georgia, the defendant, TERRELL DAVIS, also known as "Ralo," knowing that he had been previously convicted of at least one of the following offenses:

1. Theft by Receiving Stolen Property, in the Superior Court of Fulton County, Georgia, in or about 2010;
2. Possession of a Firearm by a Convicted Felon, in the Superior Court of Fulton County, Georgia, in or about 2013, and
3. Theft by Receiving Stolen Property, in the Superior Court of Fulton County, Georgia, in or about 2016,

each of which was a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, a Walther PK380 .380 caliber pistol and ammunition, said possession being in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Section 922(g)(1).

Count Six

Beginning on a date unknown to the United States Attorney, but at least as of on or about September 22, 2015, and continuing through at least on or about May 4, 2018, in the Northern District of Georgia and elsewhere, the defendant, TERRELL DAVIS, also known as "Ralo," and others known and unknown to the

United States Attorney, did knowingly and willfully combine, conspire, confederate, agree and have a tacit understanding with one another, to commit certain offenses under Title 18, United States Code, Section 1956, that is, to knowingly conduct and attempt to conduct financial transactions in and affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, the felonious manufacture, importation, receiving, concealment, buying, selling and otherwise dealing in a controlled substance, that is, marijuana, a Scheduled I controlled substance, punishable under a law of the United States, that is, Title 21, United States Code, Section 841(a)(1), knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and knowing the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of proceeds of said unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); all in violation of Title 18, United States Code, Section 1956(h).

Count Seven

On or about April 17, 2019, in the Northern District of Georgia, the defendant, TERRELL DAVIS, also known as "Ralo," an inmate of the Robert A. Deyton Detention Facility, a facility in which persons are held in custody by direction of and pursuant to a contract and agreement with the Attorney General, knowingly possessed and obtained a prohibited and forbidden object, that is, a cellular telephone and another device used by a user of commercial mobile service in

connection with such service, in violation of Title 18 United States Code, Sections 1791(a)(2) and 1791(d)(1)(F).

Forfeiture

Upon conviction of one or more of the offenses alleged in Counts One through Four of this Criminal Information, the defendant, TERRELL DAVIS, also known as "Ralo," shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including, but not limited to, the following:

- a. MONEY JUDGMENT: A sum of money in United States currency equal to the amount of proceeds the defendant obtained as a result of the offenses for which the defendant is convicted.
- b. REAL PROPERTY:
 1. 1177 Lucile Avenue, all Units 1 through 20, Atlanta, Georgia 30310;
 2. 1908 Kimberly Road, Atlanta, Georgia 30331;
 3. 1918 W. Kimberly Road, Atlanta, Georgia 30331; and
 4. 229 Maple Street, Atlanta, Georgia 30314.
- c. VEHICLES:
 1. 2010 Ford Econoline E-350 Van, bearing VIN 1FBSS3BL3ADA12654;

2. 2015 Lamborghini Aventador Coupe,
bearing VIN ZHWUR1ZDXFLA03556; and
3. 2010 Mercedes Benz E350, bearing VIN WDDHF5GB5AA070763.

d. FIREARMS AND AMMUNITION:

1. HS Products XDS 9mm pistol, bearing serial no. S3756180; and
2. Walther PK380 .380 caliber pistol, bearing serial no. WB08776.

e. CASH AND BANK FUNDS:

1. \$146,361.21 seized from SunTrust Bank account
XXXXXXXXXX7387 held in the name of Famerica, LLC; and
2. \$1,806.03 seized from SunTrust Bank account XXXXXXXXXXX4003
held in the name of Famerica, LLC.

f. PERSONAL PROPERTY:

1. One (1) black iPhone with SIM card, bearing serial number
353050090844984;
2. One (1) black iPhone with SIM card, bearing serial number
353024096171007;
3. One (1) Samsung Galaxy S8 with SIM card, bearing serial number
357721082189085;
4. One (1) ZTE model Z833 mobile phone with SIM card, bearing
serial number 325176231892;
5. One (1) silver iPhone SE model A1662 with SIM card, bearing
serial number 356598081208442;

6. One (1) G Drive USP-C 4tb external hard drive with power cable and USB cable, bearing serial number WCC7K3UAX54;
7. One (1) 18kt white gold Rolex "President" watch with 15.00 carats of diamonds;
8. One (1) 14kt white gold "Famerica" pendant with 25.00 carats of diamonds and chain;
9. One (1) 14kt white gold "dog bone Ralo" charm with approximately 7.00 carats of diamonds;
10. One (1) 14kt white gold Avianne charm with approximately 5 carats total weight of diamonds;
11. One (1) 14kt white gold "BMG" charm with approximately 3.00 carats of diamonds;
12. One (1) 14kt white gold tennis necklace with 120 diamonds and a total weight of approximately 25.00 carats;
13. One (1) 14kt white gold tennis necklace with 96 diamonds and a total weight of approximately 24.00 carats;
14. One (1) 14kt white gold ring with 34 diamonds and a total weight of approximately 7.00 carats;
15. One (1) 14kt white gold cluster earring with 18 diamonds and a total weight of approximately 1.20 carats;
16. One (1) 14kt white gold "Allah" pendant with 150 diamond and a total weight of approximately 4.00 carats;

17. One (1) 14kt white gold grill with 269 diamonds and a total weight of 5.00 carats;
18. One (1) 14kt white gold grill with diamonds and a total weight of 8.00 carats; and
19. One (1) 14kt white gold three-row diamond bracelet with a total weight of 12 carats.

Upon conviction of the offense alleged in Count Five of this Criminal Information, the defendant, TERRELL DAVIS, also known as "Ralo," shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(c) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the offense, including but not limited to: one (1) Walther PK380 .380 caliber pistol, bearing serial number WB08776.

Upon conviction of the offense alleged in Count Six of this Criminal Information, the defendant, TERRELL DAVIS, also known as "Ralo," shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in the offense and any property traceable to such property, including but not limited to the following:

- a. MONEY JUDGMENT: A sum of money in United States currency equal to the value of the property involved in the offense for which the defendant is convicted.
- b. REAL PROPERTY:
 1. 1177 Lucile Avenue, all Units 1 through 20, Atlanta, Georgia 30310;

2. 1908 Kimberly Road, Atlanta, Georgia 30331;
3. 1918 W. Kimberly Road, Atlanta, Georgia 30331; and
4. 229 Maple Street, Atlanta, Georgia 30314.

c. VEHICLES:

1. 2010 Ford Econoline E-350 Van, bearing VIN 1FBSS3BL3ADA12654;
2. 2015 Lamborghini Aventador Coupe, bearing VIN ZHWUR1ZDXFLA03556; and
3. 2010 Mercedes Benz E350, bearing VIN WDDHF5GB5AA070763.

d. CASH AND BANK FUNDS:

1. \$146,361.21 seized from SunTrust Bank account XXXXXXXXXX7387 held in the name of Famerica, LLC; and
2. \$1,806.03 seized from SunTrust Bank account XXXXXXXXXX4003 held in the name of Famerica, LLC.

e. PERSONAL PROPERTY:

1. One (1) black iPhone with SIM card, bearing serial number 353050090844984;
2. One (1) black iPhone with SIM card, bearing serial number 353024096171007;
3. One (1) Samsung Galaxy S8 with SIM card, bearing serial number 357721082189085;
4. One (1) ZTE model Z833 mobile phone with SIM card, bearing serial number 325176231892;

5. One (1) silver iPhone SE model A1662 with SIM card, bearing serial number 356598081208442;
6. One (1) G Drive USP-C 4tb external hard drive with power cable and USB cable, bearing serial number WCC7K3UAX54;
7. One (1) 18kt white gold Rolex "President" watch with 15.00 carats of diamonds;
8. One (1) 14kt white gold "Famerica" pendant with 25.00 carats of diamonds and chain;
9. One (1) 14kt white gold "dog bone Ralo" charm with approximately 7.00 carats of diamonds;
10. One (1) 14kt white gold Avianne charm with approximately 5 carats total weight of diamonds;
11. One (1) 14kt white gold "BMG" charm with approximately 3.00 carats of diamonds;
12. One (1) 14kt white gold tennis necklace with 120 diamonds and a total weight of approximately 25.00 carats;
13. One (1) 14kt white gold tennis necklace with 96 diamonds and a total weight of approximately 24.00 carats;
14. One (1) 14kt white gold ring with 34 diamonds and a total weight of approximately 7.00 carats;
15. One (1) 14kt white gold cluster earring with 18 diamonds and a total weight of approximately 1.20 carats;

16. One (1) 14kt white gold "Allah" pendant with 150 diamond and a total weight of approximately 4.00 carats;
17. One (1) 14kt white gold grill with 269 diamonds and a total weight of 5.00 carats;
18. One (1) 14kt white gold grill with diamonds and a total weight of 8.00 carats; and
19. One (1) 14kt white gold three-row diamond bracelet with a total weight of 12 carats.

If, as a result of any act or omission of the defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b) and Title

28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

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